



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

JUN 12 2012

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

**URGENT LEGAL MATTER
REQUIRES PROMPT RESPONSE**

Mark J. Bodzioch, President
Clean Rentals, Inc.
355 Church Street
New Bedford, MA 02746

Re: Clean Air Act Reporting Requirement and Testing Order

Dear Mr. Bodzioch:

The United States Environmental Protection Agency ("EPA") is evaluating whether Clean Rentals, Inc. ("Clean Rentals") located at 355 Church Street in New Bedford, MA ("Facility") is in compliance with the Clean Air Act ("the Act") and state and federal regulations promulgated under the Act. These requirements include but are not limited to the federally enforceable sections of the Massachusetts State Implementation Plan ("SIP") regulations at 310 CMR 7.00 et. seq, as well as a Limited Plan Approval E-V7 for Fuel Utilization issued by the Massachusetts Department of Environmental Protection on 10/2/98.

Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether a facility is in compliance with the Clean Air Act. This Testing Order requires Clean Rentals to sample and test emissions of volatile organic compounds and hazardous air pollutants from towel laundering operations at the Facility.

Definitions

"Day" shall mean a calendar day. When any due date herein falls on a weekend or holiday, the due date shall be deemed to be the following business day.

"Date of receipt" shall be the date indicated on the certified mail "green card," or in any other written acknowledgement of receipt of this Reporting Requirement and Testing Order.

"Hazardous air pollutant" or "HAP" shall be as defined at the Code of Massachusetts Regulations 310 CMR 7.00.

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“Potential to emit” or “PTE” shall be as defined in the Code of Massachusetts Regulations 310 CMR 7.00.

“Towel” means fabric used by commercial or industrial businesses to remove oils, solvents, or other material containing VOCs or HAPs from surfaces, hands, machinery or equipment.

“Volatile organic compound” or “VOC” shall be as defined in the Code of Massachusetts Regulations 310 CMR 7.00.

Testing Order

Within the number of days specified in each paragraph below, Clean Rentals shall provide the information and take the steps outlined below.

- 1) Within 30 days of the date of receipt, contact EPA’s William Osbahr at (617) 918-8389 to schedule a pre-test conference and a testing date. At the pre-test conference, EPA will review the various sampling, monitoring, testing, and analysis locations, procedures, and methods to be followed.
- 2) Beginning no later than 30 days from the date of receipt, document daily: a) the weight in pounds of soiled print towels processed (laundered and dried); b) the weight in pounds of soiled furniture towels processed (laundered and dried); c) the weight in pounds of soiled general use towels processed (laundered and dried) ; d) the weight in pounds of clean dry print towels, and d) the weight in pounds of clean dry furniture towels; and e) the weight in pounds of clean dry general use towels. This data shall be compiled in a spreadsheet compatible with Microsoft Excel, or in table format (compatible with Microsoft word) and submitted to EPA on a quarterly basis, beginning within 120 days of the date of receipt.
- 3) Within 90 days of the date of receipt, prepare and mail to EPA for review and approval an emissions testing protocol for the determination of the Facility’s potential to emit VOCs and HAPs, in accordance with paragraph 7 below. The emissions testing shall be designed to sample and test all emissions of VOCs and HAPs from towel laundering operations at the Facility, including, but not limited to exhausts, vents and releases associated with any solvent extraction/press process, washing machines, dryers, sorting/receiving area, and wastewater treatment area.
- 4) Within 120 days of the date of receipt, revise and resubmit the emissions testing protocol in accordance with any EPA written comments or required changes. EPA shall approve, approve with conditions, or disapprove the emissions testing protocol in writing.
- 5) Within 120 days of the date of receipt, Clean Rentals shall conduct pre-screening for VOC and HAP emission levels at the Facility. Clean Rentals shall conduct pre-screening of dryer exhaust and building exhaust points using Method TO-15 for HAPs and Method 25 and/or Method 25A for VOCs, to characterize the range of emission concentrations to

be expected during emissions testing, and to speciate compounds present in the air emissions.

- 6) Within 180 days of the date of receipt, Clean Rentals shall complete emissions testing to measure VOC and HAP emissions, in accordance with the approved emissions testing protocol.
- 7) In conducting emissions testing, Clean Rentals shall provide the information and take the steps outlined below. Specifically, Clean Rentals shall:
 - a) Use Method 25 and/or Method 25A to measure VOCs and Method 18, Method 320, Method TO-15, and/or other EPA approved method for measuring HAPs;
 - b) Create temporary (or permanent) total enclosures around the receiving area (sorting area), wash room, and wastewater treatment area that meet Method 204 prior to conducting testing, including:
 - i) Taking proper measures to ensure that the testing is conducted in a safe manner. In order to establish a safe work environment within the enclosures, Clean Rentals may need to provide additional ventilation in order to keep concentrations of VOCs at acceptable levels during the emissions test period. For example, this may be accomplished via use of fans, or fans with flex-line trunks to pull air through the room, or natural draft openings;
 - ii) While the enclosures are in place, continuously monitoring combustible gas concentrations inside each enclosure to ensure operations below the lower explosive limit (LEL) for combustible gases;
 - iii) Ensuring that all OSHA and other safety-related requirements for workplace safety are met (which may require the use of appropriate personal protective equipment, such as respirators);
 - iv) Demonstrating that temporary (or permanent) total enclosures have been established prior to and during testing by documenting a negative pressure environment for each enclosure. A continuous pressure monitoring recording device shall be used to document the pressure within the enclosure(s).
 - c) Monitor emissions of VOCs and HAPs from all exhaust vents on each enclosure, including:
 - i) Installing continuous emission monitors (CEM) for monitoring and recording VOC concentrations (which meet Method 25A) in vent locations;
 - ii) Installing a continuous flow measurement system capable of measuring and recording flow rates at vent locations.

- d) Conduct separate testing under maximum capacity scenarios for heavily soiled print, furniture and general use towels, including:
 - i) Ensuring sufficient soiled towels for each test period;
 - ii) Documenting that the towels processed during the test period represent the maximum capacity of representative towels;
 - iii) Following proper chain of custody procedures for the towels prior to testing;
 - iv) Retaining soiled towels within sealed storage containers immediately upon receipt from the customer until the date of the test, when they may be opened for the laundering process inside the sorting enclosure;
 - v) Labeling and identifying each batch of towels received with:
 - (1) Type of towel (provide Clean Rentals' color designation);
 - (2) Date and time of customer pickup; and
 - (3) Customer name or identifier.
- 8) Within 30 days of completing emissions testing, Clean Rentals shall:
 - a) Submit a complete test report to EPA;
 - b) Provide the date and time that any concentrations of combustible gases exceeded the LEL within the enclosure and description of the corrective actions taken;
 - c) Provide a list of any deviations in the negative pressure within the enclosure and detailed descriptions of the corrective actions taken;
 - d) Provide information on the facility wastewater pretreatment operations including the daily effluent flow data for the wastewater treatment operations during each day of testing, as well as an indication as to whether the ozone injection system on-site was in operation on each day of testing.

Attachment A to this Testing Order lists required elements of pre-test protocols and test reports.

Mail the submissions required by this letter to:

Susan Studlien, Director
Office of Environmental Stewardship
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100, OES04-2
Boston, MA 02109-3912
Attn: Joan M. Jouzaitis, Air Technical Unit (Mail Code OES04-2)

Be aware that if Clean Rentals does not provide the information in a timely manner, EPA may order it to comply and may assess monetary penalties under Section 113 of the Clean Air Act. Federal law also establishes criminal penalties for providing false information to EPA. This letter is not subject to Office of Management and Budget review pursuant to the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

You may assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 CFR Part 2, Subpart B. Note that certain categories of information, such as emission data, are not properly the subject of such a claim. If no such claim accompanies the information when EPA receives it, EPA may make the information available to the public without further notice to you.

If you have any questions regarding this Testing Order, please contact Joan M. Jouzaitis, Environmental Engineer, at (617) 918-1846, or, have your attorney call Thomas T. Olivier, Senior Enforcement Counsel at (617) 918-1737.

Sincerely,



Susan Studlien, Director
Office of Environmental Stewardship

cc: William Osbahr, EPA, OEME
Michael Looney, EPA, OEME
Gregg Hunt, MassDEP

Enclosures